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REMARKS

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Claims 1, 2, 4, 5, 7-12, and 14-31 are pending in this application for which applicants seek reconsideration.

<u>Amendment</u>

Claim 6 has been canceled, and independent claims 1, 11, 21, 27, 30, and 31 have been amended to more clearly set forth the present invention. No new matter has been introduced.

Art Rejection

Claims 1, 2, 4-12, and 14-31 are pending in this application. Claims 1, 2, 4-12, and 14-31 have been rejected under 35 U.S.C. § 102(b) [should be (e)] as anticipated by Takahashi (USP 6,697,167). Applicants submit that the pending claims define over Takahashi because Takahashi would not have disclosed or taught at least transferring a write control program from one storage to a second CPU for writing another control program stored in the one storage to another storage, as set forth in independent claims 1, 11, 21, 27, 30, and 31.

Independent claims 1, 11, 21, 27, 30, and 31 each call for two different (first and second) CPUs, a removable (first) storage means and a second storage means. These independent claims all call for storing a first control program for controlling operation of the first CPU, a second control program for controlling operation of the second CPU, and a write control program for causing the second CPU to write the second control program stored in the removable storage means to the second storage means. The first CPU can operate in a write control mode to transfer the write control program stored in the removable storage means to the second CPU for execution by the second CPU. Claims 2, 11, 21, 27, 30, and 31 further call for the second CPU to execute the write control program transferred from the first storage means to write the second control program stored in the first storage means to the second storage means.

Takahashi discloses an image forming apparatus 103 that forms a color copy of an original image placed on a platen, and outputs a color image based on image data sent from a host computer 101 via a controller 102, which preforms raster image processing (RIP) for interpreting and rasterizing PDL data. The image signal from the controller obtained as a result of the RIP is sent to the image forming apparatus 103 to output an image. The image forming apparatus 103 includes a first CPU 300a, which controls the operation of the image forming apparatus 103, for executing programs stored in a ROM 300b using a first memory (RAM) 300c. The controller 102 includes a second CPU 351a for storing the received PDL data in a hard disk

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354. The second CPU 351a interprets and rasterizes PDL data by executing programs stored in a ROM 351b using a second memory (RAM) 351c.

Takahashi discloses two different density and gradation controls (automatic gradation correction) to obtain stable image density and gradation characteristics upon formation of a full-color image. Referring to Fig. 9, the first CPU 300a executes a first control, after test print 1 is formed and read, to process conditions of the image processing apparatus. To suppress changes in image density and gradation reproducibility and to obtain stable density and gradation reproducibility, a second control for controlling the image density and gradation reproducibility is executed, also by the first CPU 300a. In other words, Takahashi discloses controlling the image density and gradation characteristics with the first control, and controlling the image density and gradation reproducibility with the second control, using the first CPU 300a.

Takahashi's second CPU 351a of the controller 102 solely executes interpretation and rasterization of PDL data. Indeed, in Takahashi, the first CPU 300a alone executes both the first and second control programs for the first and second controls in the automatic gradation correction. In contrast, the claimed invention calls for the first and second programs to be executed by the first and second CPUs, respectively, not the same CPU.

Further, independent claims call for storing all three programs (first control program, second control program, and a write control program) in a removable storage means. While Takahashi can be construed as disclosing the first storage 300c storing first and second control programs, Takahashi does not disclose storing the write control program (for causing the second CPU to write the second control program to the second storage) in the first storage. Accordingly, Takahashi would not have disclosed or taught transferring the write control program (for writing the second control program stored in the first storage to the second storage) to the second CPU, let alone executing such a write control program by its second CPU 351a. Moreover, Takahashi does not disclose its first storage being removable.

In sum, Takahashi fails to disclose or suggest the claimed first storage means that stores the first control program, the second control program, and a write control program, let alone executing the write control program by the second CPU to write the second program stored in the first storage means to the second storage means. Accordingly, the pending claims clearly define over Takahashi within the meaning of § 102, as well as § 103.

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Conclusion

Applicants submit that claims 1, 2, 4, 5, 7-12, and 14-31 patentably distinguish over Takahashi and are in condition for allowance. Should the examiner have any issues concerning this reply or any other outstanding issues remaining in this application, applicants urge the examiner to contact the undersigned to expedite prosecution.

Respectfully submitted,

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